

A CRITICAL ANALYSIS OF THE CITY OF ATLANTA'S
ADMINISTRATION OF ITS COMMUNITY
DEVELOPMENT BLOCK GRANT

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TABLE OF CONTENTS

List of Tables	ii
Section	
I. INTRODUCTION	1
II. COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM DESCRIPTION	5
III. ATLANTA'S COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM--FIRST, SECOND AND THIRD YEAR	9
IV. IDENTIFICATION OF PROBLEMS ASSOCIATED WITH ATLANTA'S COMMUNITY DEVELOPMENT BLOCK GRANT	13
V. GUIDELINES AND STRATEGIES TO IMPROVE THE ADMINISTRATION OF THE COMMUNITY DEVELOPMENT BLOCK GRANT	29
VI. CONCLUSION	37
APPENDICES	43
BIBLIOGRAPHY	53

LIST OF TABLES

1. First and Second Year Community Development Block Grant Applica- tions	12
2. HUD Area IV CDBG Entitlement Record First Year Program Monies	15

SECTION I

INTRODUCTION

The purpose of this paper is to provide an objective analysis of the City of Atlanta's administration of its Community Development Block Grant. Also, this paper is intended to assist city policy makers in evaluating whether the program has been efficiently administered to date.

The paper will be confined to the following areas:

1. To examine and identify various reasons why the City of Atlanta has been criticized for its failure to demonstrate significant progress toward program implementation.
2. To analyze the programmatic and geographic allocation of the CDBG in order to determine whether Atlanta's citizens are obtaining maximum feasible benefits and whether these allocations are having maximum impact on the city's most pressing physical development needs.
3. To recommend alternative policies and administrative policies and administrative strategies, which may enhance the overall effectiveness of Atlanta's community development program in future years.

Data concerning the city's first, second and third year CDBG applications and project status were obtained from various divisions within Atlanta's Department of Community and Human Development and from the federal Department of Housing and Urban Development. Information about former HUD categorical programs was obtained from the Atlanta Housing Authority and other books and journals. General data concerning CDBG was obtained as a result of interviews, books, and journals. Special acknowledgement for

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For over thirty years the federal government has been directly involved in housing and urban development programs. Yet today, we continue to speak of the "urban crisis"--racial conflict, inadequate housing, air and water pollution, poor schools, crime and delinquency, crowded hospitals, traffic congestion, crippling city tax burdens, and poorly paid policemen and other municipal workers.

The failure of federal urban policy to resolve these problems has been due to frequently conflicting policies, incompatible goals, and competing government programs which reflect underlying conflicts over public policy. Let us examine the United States' search for a national urban policy.

The aims, strategies, and results of federal urban development policy have evolved in four major cycles since the late 1940's. These cycles are specific legislative landmarks: the Housing Act of 1949 and its amendments (the basis of the Federal Urban Renewal Program); the Demonstration Cities and Metropolitan Development Act of 1966 (the basis of the Model Cities Program); the Housing Act of 1968 (the basis of the Neighborhood Development Program); and the Housing and Community Development Act of 1974 (the basis of the Federal Community Development Program).

The Urban Renewal Program was the federal government's major development policy of the 1950's and early 1960's. Its initial aims were

commercial redevelopment and the provision of more and better housing through residential slum removal. However, because of widespread dissatisfaction with the program, urban renewal changed its focus over the years, ultimately developing into the Neighborhood Development Program (NDP). This trend saw an expansion of the geographic scope of local renewal projects from a plot of land chosen for reuse value after clearance to a total neighborhood whose basic physical fabric was to be preserved. In addition, NDP identified a new purpose which was a move away from the demolition of housing. The new purpose was rehabilitation and revitalization of older central city residential neighborhoods. Although the new changes were intended to improve the image of urban renewal, people continued to be disenchanted. The multi-billion dollar program had hardly made more than a dent in clearing the nation's slums. Moreover, in many cases, urban renewal had added to inner-city tensions by forcing poor people from their homes to make way for middle or upper income housing and commercial centers.

The Federal Model Cities Program was also a reaction to the shortcomings of urban renewal. In 1966, Congress approved a major new Model Cities Program under the direction of the Department of Housing and Urban Development (HUD). The purpose of the program was to demonstrate how the federal government could work with city governments in a concentrated and coordinated attack on urban blight. The goal of the Model Cities Program was to rebuild entire poverty neighborhoods in selected cities, and to attack social programs as well as the physical problem of decaying buildings. The program was aimed especially at improving conditions in the black urban ghettos. Model Cities was one of the major legislative programs passed under President Johnson's "Great Society." The concept was developed by Robert C. Wood of the Massachusetts Institute of Technology. He was

appointed the first undersecretary of HUD.¹

The federal government paid up to 80 percent of the cost of the program. By 1970, Congress had provided \$1.3 billion for Model Cities in 150 communities, but the program was embroiled in considerable controversy. Critics charged that the program suffered from excessive federal red-tape and insufficient federal funding. At the local level there was conflict between city hall and citizen groups over control of the program.

¹ National Commission on Urban Problems, Building the American City,
U. S. Government Printing Office, 1968, p. 18.

SECTION II

COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM DESCRIPTION

Title I of the Housing and Community Development Act of 1974 established the Community Development Block Grant (CDBG) program. The block grant wraps up, in one package, elements of some controversial old federal programs such as urban renewal, model cities, and rehabilitation loans; and some non-controversial ones such as water and sewer facilities, open space grants, and loans for neighborhood and other public facilities. Instead of the so-called categorical programs with numerous regulations, Congress gave local governments \$8.4 billion over three years to meet twelve objectives. The objectives include the following:

- (1) Acquisition of real property which is blighted, undeveloped or inappropriately developed, appropriate for conservation or rehabilitation, needed for eligible public works, or needed for other public purposes;
- (2) Construction or installation of certain public works and facilities;
- (3) Clearance, demolition, and rehabilitation of buildings;
- (4) Special projects to assist the mobility of elderly and handicapped persons;
- (5) Payments for temporary housing of persons displaced by community development;
- (6) Disposition of real property acquired as a result of community development;
- (7) Provision of public services not otherwise available in areas of concentrated activities;

- (8) Payment of local match for other federal grants;
- (9) Payment of cost of completing existing urban renewal projects;
- (10) Relocation payments;
- (11) Activities necessary to develop a comprehensive plan and a policy-planning-management capacity for community development activities; and
- (12) Payment of reasonable administrative costs related to community development and housing activities.²

The funds to accomplish these activities are allocated by a formula taking into account population, poverty, and the extent of overcrowded housing. In the first year almost three thousand communities were eligible for a portion of \$2.5 billion. More than 70 percent of this (\$1.8 billion) went to 521 cities with populations over 50,000 and urban counties. Some of these cities received their funds on the basis of past HUD funding levels rather than by formula, under a provision known as "hold harmless" which maintains the level of prior federal funding for five years. In addition, 770 smaller communities divided \$440 million under the "hold harmless" provisions, and another \$100 plus million was divided among 1,500 other smaller communities.³

Applications for funds must be submitted annually to HUD. Included in the application is a summary of a three-year plan which determines needs, demonstrates strategies, and outlines specific objectives. In addition, a one year program is required. The one-year program must take into account

²Joseph Harman, "The Block Grant: Readings from a First Experiment," Public Administration Review, March 1970, p. 80.

³Ibid., pp. 81-82.

a general description of the proposed activities to be undertaken, their estimated cost and general location, and an identification of any other resources available to help meet needs and objectives. The principal beneficiaries of the program are to be persons of low and moderate income. To ensure this, mayors are required to certify in their applications to HUD that they have given "maximum feasible priority" to programs aimed at benefiting lower income people and eliminating and preventing slums and blight.

Another requirement for any locality seeking Community Development Block Grants is the submission of a Housing Assistance Plan for HUD approval. The Housing Assistance Plan is supposed to accurately survey the condition of the housing stock in the community; assess the housing assistance needs of lower income persons residing or expecting to reside in the community; specify a "realistic" annual goal for such housing assistance; and indicate the general location of planned housing construction. The Housing Assistance Plan is also required to meet the objectives of promoting greater choice of housing opportunities and avoiding undue concentrations of assisted persons in areas containing a high proportion of lower-income persons.⁴

Applicants must also conform to regulations related to environmental protection, low-income employment opportunities, the Uniform Relocation Act of 1970, civil rights laws, citizen participation (including information about the program, public hearings on needs, and participation in the development of the application), and A-95 Review. There is a seventy-five day HUD review period on all applications for entitlement amounts

⁴Gerald Silverman, "The Housing and Community Development Act of 1974: Deconcentrating the Poor," AIA Journal, March 1976, p. 22.

and a provision that communities submit annual performance reports to HUD concerning the relationship of activities to objectives.

Title I of the Community Development Act of 1974 also authorizes three sources of discretionary funding which are awarded by the Secretary of HUD and are designed for special community development needs not met through formula entitlements. They include: the urgent needs fund; the Secretary's fund; and the non-metropolitan and the Standard Metropolitan Statistical Area general purpose fund. The urgent needs fund is designed to facilitate an orderly transition to the CDBG program from viable but uncompleted projects under specific HUD categorical grant programs (e.g., urban renewal projects, water and sewer projects, neighborhood facilities and open space projects, etc.). The Secretary's fund authorizes grants for new town development, areawide planning, compensation for technical and accounting errors in the computation of formula entitlements, federally recognized disaster areas, and innovative programs. The general purpose fund contains the largest appropriations and is available to all states and units of general local government excluding metropolitan cities, urban counties, and other local governments otherwise eligible for formula entitlements.⁵

⁵Mary K. Nenno, "Major Issues in Pending Housing and Community Development Legislation," NAHRO Information Center for Community Development, (September, 1977), pp. 47-49.

SECTION III

ATLANTA'S COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM--FIRST, SECOND AND THIRD YEAR

The City of Atlanta was given a three-year funding commitment of \$52.7 million under Title I of the Housing and Community Development Act of 1974. Due to the required phase-down inherent in Title I's "hold harmless" provisions, Atlanta will receive this amount in decreasing increments: \$18.8 million for the first program year, \$17.6 million for the second year, and \$16.4 million for the third year.

The city's Department of Community and Human Development (DCHD) is responsible for the overall administration of the CDBG. DCHD's duties and responsibilities are identified and described as follows: oversees the development of a Community Development Program; provides public information about the program; holds public hearings for citizen input (two are required for each yearly CDBG application and two for any program amendments); and prepares the city's annual Housing Assistance Plan. During the first year, DCHD had the responsibility of describing all projects and their costs. However, in the second and third year this responsibility was given to other city operating departments.⁶

When the first program year began in May of 1975, DCHD's Office of Grant Planning and Management was given the responsibility for overall

⁶ Research Atlanta, "Community Development in Atlanta," Atlanta Research, Inc., 1976, p. 11.

program planning, project selection, financial and management support, environmental impact assessments, and contract administration of the CDBG. DCHD's responsibility for actual project implementation, however, was confined to certain housing and physical activities (through its Bureau of Housing and Physical Development); social services (through its Bureau of Human Services); and code inspection (through the Bureau of Buildings). Responsibility for implementing other projects was assigned either to other operating departments in city government through letters of agreement (e.g., to Department of Environment and Streets for street and sewer projects; to the Department of Parks, Libraries and Cultural Affairs for park development, etc.) or to outside agencies by contract (e.g., Atlanta Housing Authority for housing rehabilitation, etc.). There was a continuation of these same relationships and arrangements during the second and third program year. However, there were a few exceptions regarding the sharing of certain responsibilities. The environmental assessment, the administration of many contracts, and the preliminary review of project ideas are being shared by DCHD with appropriate operating departments.

The criteria used in identifying those areas of the city to receive CDBG allocations was similar to the formula used by HUD. This formula is based on the extent of poverty and the overcrowding of housing in a particular locality. As a result of the HUD formula, seventy-six of the city's 180 neighborhoods were declared eligible for CDBG monies. Eventually, thirty-eight of the seventy-six eligible neighborhoods were chosen for second and third year activities. The twelve city council districts were included during the three years. These Community Development Impact Areas for the two program years are shown on Maps I and II in Appendix A.

The third year Community Development Impact Area is similar to the second year.

The activities in the first, second and third years were subdivided into five program areas: Housing and Neighborhood Development; Economic Development; Urban Growth Management; Human Development; and Urban Environment Enhancement.

The Housing and Neighborhood Development Program is designed to improve housing structures and public facilities in residential areas. Economic Development provides funds to small-scale or neighborhood business development. Urban Growth Management consists of land acquisition activities and clearance of land in order to begin shaping and guiding land use patterns in the city and especially in the MARTA transit station areas. The Human Development component encompasses a range of activities directed toward housing support services, comprehensive services for the elderly and handicapped person, and youth oriented services. Urban Environment Enhancement includes activities related to historic preservation and the removal of architectural barriers to facilitate elderly and handicapped mobility.

During each program year, the funds have been distributed and allocated in a similar manner. The largest investments have gone to Housing and Neighborhood Development. Within the Housing and Neighborhood Development program, considerable emphasis was given to housing rehabilitation, public improvements, and open space and recreation. Urban Growth Management received the next highest allocation of funds. Economic Development, Human Development and Urban Environment Enhancement comprised a small portion of the grant. Table one indicates first and second year allocations. The third year allocations were distributed in a similar manner.

Table I

12

**FIRST AND SECOND YEAR COMMUNITY DEVELOPMENT
BLOCK GRANT ALLOCATIONS**

	First Year Allocations		Second Year Allocations	
	dollars	% of total grant	dollars	% of total grant
I. HOUSING AND NEIGHBORHOOD DEVELOPMENT:	\$9,359,850	49.8%	\$7,118,650	41.2
Housing Rehabilitation	2,360,000	12.6	1,900,000	10.8
Housing Code Assistance	395,500	2.1	320,000	1.8
Demolition and Clearance	1,025,200	5.5	400,000 ¹	2.3
Public Improvements	2,224,600	11.8	900,000	5.1
Open Space and Recreation:	2,906,750	15.5	3,500,000	19.9
a) Recreation Development	655,350	3.5	794,100	4.5
b) Recreation Improvement	1,671,400	8.9	705,900	4.0
c) Neighborhood Facilities	580,000	3.1	2,000,000	11.4
Environmental Development	447,800	2.4	228,650 ²	1.3
II. ECONOMIC DEVELOPMENT:	1,200,000	6.4	100,000	0.6
Business Assistance Loans	500,000	2.7	-0-	0
Associated Site Improvements	700,000	3.7	-0-	0
Comm./Industrial Development	-0-	0	100,000	0.6
III. HUMAN DEVELOPMENT (Social Services)	813,000	4.3	813,000	4.6
IV. URBAN ENVIRONMENT ENHANCEMENT	278,600	1.5	290,000	1.7
Historic Preservation	214,300	1.2	290,000	1.7
Removal of Arch. Barriers	64,300	0.3	-0-	0
V. URBAN GROWTH MANAGEMENT	4,996,700	26.6	7,418,000	42.2
Transit Area Development	4,441,700	23.6	1,306,400	7.4
Land Acquisition and New Redevelopment	200,000	1.1	1,841,000	10.5
Interest on Urban Renewal Notes	355,000	1.9	355,000	2.0
Maintenance of Urban Renewal Property	-0-	0	400,000	2.3
Payment of Principal on Urban Renewal Loans	-0-	0	3,515,600	20.0
VI. PROGRAM MANAGEMENT³	1,835,000	9.8	1,357,400	7.7
Planning and Management	363,000	1.9	300,000	1.7
Program Administration	1,164,000	6.2	932,400	5.3
Citizen Participation	38,000	0.2	125,000	0.7
Payment of Non-federal share	270,000	1.5	-0-	0
VII. CONTINGENCIES	296,850	1.6	350,950	2.0
TOTAL ENTITLEMENT AMOUNT	18,780,000	100%	17,578,000	100%

¹In the second year, Demolition and Clearance falls under the Urban Growth Management program, but is shown under the Housing and Neighborhood Development program to ensure comparability to first year allocations.

²Environmental Development was shifted to the Urban Environment Enhancement program in the second year. It is shown as a part of the Housing and Neighborhood Development program for purposes of comparison with first year allocations.

³This section does not include the overhead costs of operating the CDBG program in other operating departments.

SOURCE: Research Atlanta, Inc., "Community Development in Atlanta", Atlanta, Research, Inc., 1976.

SECTION IV

IDENTIFICATION OF PROBLEMS ASSOCIATED WITH ATLANTA'S COMMUNITY DEVELOPMENT BLOCK GRANT

Due to a new charter, and an even newer city administration, the City of Atlanta was not adequately prepared to take full advantage of CDBG resources when the first program year began in 1975. Neither a coherent community development policy nor an effective planning and management apparatus existed at the advent of CDBG. As of today, no progress has been made toward the development of a community development policy and a planning and management apparatus.

In addition, Atlanta has had problems of a general nature. They have encountered the greatest problems in spending money allocated for acquisition and disposition of real property, rehabilitation loans and grants, relocation payments, and public works activities. A persistent problem deals with administrative concerns such as staffing, interagency coordination, etc. In addition, there have been problems associated with contractors and the bidding process.

Specifically, the problems which have caused significant delays will be identified and described below. These problems include administrative as well as problems in identifying priorities and policies.

Administrative Problems

Atlanta had spent only 25 percent of its first program year entitlement as of September 30, 1976. This was one month into the second program year. This placed Atlanta ninth out of thirteen southeastern cities in demonstrated ability to execute a Community Development Program. Table 2 indicates first year expenditures of thirteen southeastern cities with CDBGs.

There appears to be three general reasons why the City of Atlanta has not made significant progress toward the completion of projects outlined in the CDBG. The following conclusions were reached as a result of interviews with city and HUD officials and a review of CDBG program materials:

- (1) Initially, the mayor did not issue a clear statement in regards to which city department would have the overall responsibility or the authority over the CDBG.
- (2) Later, it was decided that the Department of Community and Human Development would have the administrative authority over the CDBG program. There was development, within DCHD, of independent staff capacities to handle program planning, the financial management and contract administration. These were duplicated functions already in existence in the Department of Administrative Services and the Department of Budget and Planning. The duplication seriously impeded the kind of interdepartmental cooperation needed for efficient program operation.
- (3) DCHD's staff lacks experience in administering physical development programs and coordinating CDBG's activities with other city departments. This inexperience caused tremendous delays in project formulation and implementation.
- (4) Specific projects have neither been developed nor approved by the mayor and city council until well after each program year began (i.e., after HUD had approved the city's more general program application), causing further delays in project implementation and the need to reassess and, in some cases, revise project costs.

TABLE 2
 HUD AREA IV CDBG ENTITLEMENT RECORD
 FIRST YEAR PROGRAM MONIES

City	Entitlement	Drawn Down 9/30/76	Total %
Spartanburg, S. C.	\$ 4,434,000	\$ 2,485,102	56.0
Jacksonville, Florida	5,193,000	2,877,000	55.4
Tampa, Florida	8,577,000	4,229,500	49.3
Greenville, S. C.	2,205,000	918,303	41.6
Miami, Florida	3,165,000	1,300,442	41.1
Charlotte, N. C.	10,594,000	4,357,500	41.1
Savannah, Georgia	7,264,000	1,858,000	25.6
Columbia S. C.	1,936,000	467,875	24.2
Atlanta, Georgia	18,780,000	4,459,437	23.7
Charleston, S. C.	897,000	195,931	21.8
Memphis, Tennessee	5,744,265	1,267,497	22.1
Birmingham, Alabama	5,400,000	1,026,000	19.0
Louisville, Kentucky	8,639,000	1,379,832	16.0

Lack of Clear Executive Guidance

The adoption of a new city charter and the passage of the Housing and Community Development Act were directly related to the lack of clear executive guidance. The charter set forth a strong mayor system, administrative reorganization, and restaffing of city departments. The city charter allows the mayor a tremendous amount of discretion in determining the location of functional responsibility over a number of areas. Along with this new vested power came added problems. Disputes began to arise among the newly created Department of Budget and Planning (DBP), the equally new Department of Community and Human Development (DCHD) and the Atlanta Housing Authority (AHA) over what the substance and process of CDBG administration should entail. Each department had its own interpretation of the Community Development legislation.

A speedy resolution to the issue of authority over CDBG did not occur largely because of the unresolved relationships between the mayor's office, DCHD, DBP, and AHA. A coordination strategy for CDBG administration was exemplified by an executive order drafted early in 1975, which clearly delineated the functions of all operating departments, established channels for cooperative action, and called for a detailed transition plan for the city's assumption of urban renewal functions from AHA. However, the order was neither signed nor implemented.⁷

Functional Duplication and Lack of Coordination

DCHD established two offices to perform its administrative functions. However, this was a duplication of efforts. The Bureau of Housing and Physical Development and Office of Grant Planning and Management began to

⁷Ibid., p. 12.

develop independent staff capacities for program planning (including citizen participation), financial management, and contract administration services which were already available and functioning within other city departments. The lack of practical experience in the administration of physical development programs further complicated matters. The new CDBG administrative staff were former Model Cities employees who were not properly trained for the types of tasks it presumably was to perform. In addition, no internal strategy was defined until the end of the first program year. This resulted in DCHD's staff trying to develop and carry out first-year program responsibilities as they arose. Also, they were unable to develop any functional referral system among other city departments and AHA. Pursuant to an April 1976 memorandum from the commissioner of DCHD, the department did begin to relinquish certain functions to other departments in preparation for the second year. However, this was done in a less systematic fashion than might have occurred with an executive coordination strategy structured and conveyed from the outset.⁸

Although the Department of Budget and Planning had developed a city council approved Neighborhood Planning Unit process, NPU boundaries had only recently been defined when CDBG's first program year began. As a result, DCHD felt it had no option but to establish its own citizen participation system to expedite CDBG's planning. However, instead of formally integrating that system with the NPU process once the latter became operational, DCHD continued to maintain separate communications with neighborhood residents, with only informal attempts to coordinate with DBP planners. The results of this were three-fold: (1) an extensive, uncoordinated group of project proposals were made with little attempt

⁸Ibid., p. 22.

to relate them to the goals, policies and objectives of the Comprehensive Development Plan as defined earlier by some of the same citizens; (2) time was spent in operating a special citizen involvement effort by an already overextended DCHD staff; and (3) project proposals from citizens were received by a variety of city operating departments instead of being directly channelled to DCHD.⁹ The NPU and CDBG hearings were coordinated more systematically in the second and third program year. However, two separate processes still exist.

After the community development needs were defined for the first year, DCHD assigned final budget allocations to the various programs areas. The Department of Budget and Planning originally performs this particular responsibility for all other city programs. Instead of forwarding this function to the appropriate department (Department of Budget and Planning), DCHD decided to collaborate informally with DBP and retain the final review authority. When assignments were finally made, the fiscal parameters used were based only on general criteria.

The process used to assign budget allocations for the second and third program year were completed in a different manner. DCHD received suggestions regarding project ideas from other operating departments. In addition, these departments were allowed to make a preliminary review and make comments on the budgetary allocations. However, final review and project determination continues to be done by the DCHD staff.

For the actual implementation of CDBG projects, DCHD devised a contract monitoring and administration mechanism through letters of agreement with other city departments and through master contracts with AHA. This mechanism evolved within DCHD as a start-to-finish internal

⁹Ibid., 23.

function, although contract administration for all other city programs was handled by the Department of Administrative Services. Negotiations between DCHD and other departments to reach final "sign-offs" on project responsibilities were lengthy and complicated by interdepartmental rivalries. According to interviews with various officials, most operating departments outside DCHD viewed CDBG monies as an additional source of funds to be used in the routine budgetary and operational processes for enhancing and accomplishing already existing city programs and capital improvement projects. However, DCHD viewed CDBG monies as a special funding source, with special administrative requirements, and attempted to administer the CDBG program autonomously.

But in the absence of mayoral direction clearly establishing responsibility for program administration and in the absence of any comprehensive community development policy, other departments complained. The Department of Budget and Planning continued to challenge the "taking" of CDBG planning responsibility by DCHD; and the Department of Environment and Streets considered CDBG projects low priorities in developing its annual work program.¹⁰

Delays in Project Implementation

The City of Atlanta has always managed to complete program planning before the beginning of each program year. However, the selection of individual projects within the CDBG have not been completed until well after the beginning of each year. The general activities described in the application have been broad and vague, leaving many of the specific projects to be decided later. Two examples verify this point.

¹⁰Ibid., p. 24.

It was seven months after the first year began that a full list of projects had been formulated and approved by the mayor and city council. In addition, three months after the beginning of the second program year, a recommended list of projects had just recently been reviewed by the council.

The city's failure in defining specific projects before applying for funds has delayed program implementation through a fragmentation of the program review process. The review process involves multiple hearings among several departments, the mayor's office, city council and the citizens. The city's annual application must be reviewed prior to the beginning of each program year. HUD requires that two public hearings be held before the application is submitted. While the public hearings are being held, the city council must review and approve the application and authorize the mayor to apply for funds. Since executive and legislative approval must also be given to individual projects, an additional review period is needed after the start of each program year. By recent estimates, the time required for a second set of public hearings and an additional review of project allocations by the mayor and city council imposes a delay of ten weeks on the total program--a delay that could be avoided if specific project allocations were contained in the original grant application.¹¹

A second problem causing additional delays in program implementation was the preparation of environmental assessments. It is mandatory that an environmental assessment be prepared, advertised, and undergo a forty-nine day review before CDBG funds for any project will be released by HUD. This particular regulation was a new requirement of

¹¹ Ibid.

CDBG legislation. Naturally, DCHD was unfamiliar with the process of environmental assessment. This unfamiliarity, combined with understaffing in DCHD, imposed serious delays in environmental certifications and project execution.¹² By the time Atlanta submitted its performance report to HUD at the end of the first program year (April, 1976), environmental assessments for only half of the projects had been completed, almost one-third were still in preparation, and the remainder were undergoing review. At that time, it was estimated by the city's Bureau of Budget Policy and Evaluation that the preparation of environmental assessments had taken from eighty-three to 143 days for each project (including the required forty-nine day HUD review period).

There have been some changes in the environmental assessment preparations as a result of difficulties encountered in the beginning. During the first year of the program, DCHD's Office of Grant Planning and Management designed a system to reduce the number of steps used to prepare environmental assessments and standardize the reporting procedures. However, the reduction of completion time for environmental assessments has only been seventy-eight to 108 days. A more significant procedural modification made in the second and third program year was the shift in responsibility for environmental preparations to the "lead group" (or department) charged with the development of projects in each program area, with only technical assistance being provided by DCHC.¹³ This procedure has greatly assisted in reducing the volume of environmental assessments undertaken by the small technical staff in DCHD and should expedite the identification of environmental impacts.

¹² Ibid., p. 28.

¹³ Ibid., p. 29.

Despite these changes, the delays in preparing environmental assessments during the first program year have had a lingering effect on projects yet to be implemented. Since these projects were initially approved, inflation had pushed project costs above original estimates. In fact, all first-year projects required budget revisions before fund appropriations could be made. These problems have not been curtailed significantly in the second and third year.¹⁴ For example, the execution of second-year projects were set back to June, 1977.

Problems in Identifying Priorities and Policies

The Housing and Community Development Act of 1974 gives localities tremendous discretion in determining how their funds will be used. Consequently, it is mandatory that each city advance its own development policy and implementation strategy. Some cities have undertaken this task in a systematic fashion; others, Atlanta among them, in a haphazard manner. In fact, Atlanta's overall community development policies have never been clearly and systematically defined, nor has criteria been clearly established and followed in the selection of CDBG projects or geographic target areas. In addition, other important issues have been left unresolved: the status of unfinished urban renewal and NDP projects; the development of an investment strategy concerning the "leveraging" of CDBG funds; and the emphasis to be placed on economic development activities.

Completion of Urban Renewal and NDP Projects

The City of Atlanta has three unfinished urban renewal projects in

¹⁴Office of Grant Planning and Management, "City of Atlanta's Three Year Community Development Block Grant Programs", City of Atlanta, 1975, p. 34.

Rockdale, Thomasville, and West End. In addition, there are five unfinished projects in the Neighborhood Development Programs (Bedford-Pine, Georgia Tech II, Model Cities, Edgewood, and Vine City).¹⁵ The above projects are considered to be public improvements on parcels of cleared land. This land is to be resold to private developers for residential and/or commercial redevelopment and rehabilitation. However, after spending at least \$120 million from federal and local sources, unfinished acreage currently amounts to 514 out of the total 968 acres acquired for all eight projects; and according to recent estimates from AHA, at least another \$37.1 million will be needed to complete them.¹⁶ Since the city has budgeted only \$3.6 million, and AHA, has only \$5.9 million to complete these projects, one might expect them to receive top priority for CDBG funding.

This has not been the case. During its first program year, the city allocated approximately \$6.6 million, or 35 percent of CDBG monies for a variety of projects located within active urban renewal and NDP areas. Although these allocations were made in urban renewal areas, they were not necessarily directed toward completing urban renewal projects. Many of the CDBG funded projects evolved from the AHA developed plans for these areas. This indicates lack of coordination between the city and AHA.¹⁷

Since there has been no progress toward project completion, attention has been focused on the amount of outstanding urban renewal project

¹⁵ Ibid., p. 37.

¹⁶ Ibid., p. 39.

¹⁷ Research Atlanta, "Community Development in Atlanta", Atlanta Research, Inc., 1976, pp. 30-31.

notes. These notes are issued by AHA and guaranteed by the federal government in order that they may be used for the initial purchase and clearance of urban renewal project areas for unpaid principal or urban renewal loans. During the Urban Renewal Program years, project loans were intended to be repaid from proceeds gained through the area's re-sale when projects were completed. However, the Housing and Community Development Act of 1974 introduced a provision by which HUD may hold up to 20 percent of a city's CDBG grant to retire the outstanding principal and interest on such loans. Cognizant of that authority, the city chose to invest \$3.5 million, or 20 percent of its second year entitlement to retire these outstanding loans (leaving a \$16.9 million loan deficit outstanding).¹⁸

In order to fill the gap between needed and available funds, the city applied for an open ended grant from the urgent needs discretionary fund. If approved, the money may be used either for the repayment of loans or for payment of project costs. If not, both loan repayment and project completion will have to be achieved through other means.

The situation poses an important priority problem for the city's CDBG program. It is likely that HUD will continue to withhold 20 percent of the city's total CDBG allotment for loan purposes. Even if the entire \$16.9 million were repaid to HUD, there still would remain at least \$37.1 million in improvements necessary for the completion of urban renewal projects.¹⁹ If CDBG monies now allocated for various projects throughout a number of urban renewal areas were programmed instead

¹⁸ Ibid., p. 31.

¹⁹ Ibid., p. 32.

to complete one or perhaps two marketable projects, much of this loan deficit could be reduced, saving the city substantial sums of money in the long run.

Such an approach has not been pursued by the city. In fact, other than the money set aside to retire outstanding urban renewal loans, less than \$2.6 million, or 14.8 percent of the city's second year CDBG has been allocated for urban renewal areas.²⁰ The second year monies are being distributed in the same manner as the first year which is on a scattered, uncoordinated basis. As a result, the city has apparently chosen the more expensive route of closing out land purchase and clearance loans with HUD.

Geographical Coverage

The Housing and Community Development Act of 1974 also allows cities a great deal of flexibility in determining specific criteria for choosing geographical territories to receive CDBG resources. The City of Atlanta identified three alternative geographical target areas that could be eligible to receive CDBG resources. They include the former Model Cities area, city council districts, and Neighborhood Planning Units (as defined by the city's Comprehensive Development Plan process). Also, the Department of Budget and Planning advanced the idea of selecting "reviving neighborhoods" which are those midway between the most stable and most deteriorated.²¹ However, the geographical target areas were designated by census tracts in the first year and translated into neighborhoods in the second year. The target areas were chosen on the basis

²⁰ Office of Grant Planning and Management, "City of Atlanta's Three Year Community Development Block Grant Programs", City of Atlanta, 1975, p. 56.

²¹ Ibid., p. 89.

of a formula identifying general housing and income characteristics. This is the same formula HUD uses to determine a city's basic CDBG entitlement. In short, Atlanta-based target selection criteria were suggested but not used. As a result, the city's Community Development Impact Area now covers more than one-third of the city, encompasses all former model cities and urban renewal areas, reaches into every city council district and includes fifty different neighborhoods.

Project Selection

The City of Atlanta has never adhered to any clearly defined set of project selection criteria. A planning document was prepared jointly by DCHD and DBP in order to determine CDBG projects and allocations. This document included program objectives and general activities to be organized in "program areas." However, the plan was not utilized as a basis for establishing project priorities and finalizing first-year funding decisions. Instead, ideas for various projects in the designated areas come from city councilmen, neighborhood groups, community leaders, and other city departments.

The formula and procedures by which these proposals were fitted to target areas remain unclear. No evidence exists to indicate that the needs of one neighborhood were systematically assessed against those of others, or that project proposals were ranked according to a defined set of objectives before final programs were formulated. There was no regard to whether the proposed projects would further the overall community development goals. Existing criteria from the city's comprehensive Development Plan in the second and third year.²²

²² Ibid., p. 90.

Investment Strategy

A number of cities have developed strategies for concentrating CDBG resources. A city can utilize a "focused investment". This policy is designed to achieve maximum impact with limited funds by attracting or "leveraging," additional public or private investments both geographically and programmatically (in housing, commercial development and preservation, economic development, or comprehensive neighborhood improvement).²³ In Atlanta, however, CDBG monies have been allocated largely for "one time only" scattered-site neighborhood improvements. Project lists for the three program years demonstrate little long-term interest in any given neighborhood. There has been little attempt to leverage additional investments in CDBG areas.

There has been some effort to spend CDBG project monies on projects already undergoing development. In the first year, about 30 percent of CDBG monies were allocated for public works projects which coincided with MARTA development but this allocation dropped drastically in the second year. The city has used very small amounts in the first and second years as local matching shares for small federal grants and has contributed \$100,000 for high risk rehabilitation loans in the Neighborhood Housing Service Project in Grant Park. However, these examples do not add up to any sort of systematic investment strategy designed to attract additional uncommitted resources to CDBG developed areas.

²³Research Atlanta, "Community Development in Atlanta", Atlanta Research, Inc., 1976, p. 35.

Economic Development

In several cities, attempts have been made to coordinate community development and economic development programs. This emerging trend is logical, since both policy areas have similar concerns: investments in the city; land use; disposition of city-owned properties; availability of suitable housing; and commercial vitality. However, Atlanta allocated 6.4 percent of its first year grant and 0.6 percent of its second year grant for economic development.

SECTION V

GUIDELINES AND STRATEGIES TO IMPROVE THE ADMINISTRATION OF THE COMMUNITY DEVELOPMENT BLOCK GRANT

The City of Atlanta Needs to Place CDBG Authority Within Offices or Staff Departments Already Having Overall Planning and/or Budgeting Responsibilities

The Department of Budget and Planning would be the ideal department for such a major functional reassignment. CDBG program planning and project formulation could be more closely integrated with other city planning processes, particularly with the formulation and execution of the city's Comprehensive Development Plan.

In addition, there are other possibilities which could evolve from such an arrangement:

- (A) Since DBP has been mandated in the city charter to plan other community development and neighborhood revitalization programs, programmatic and target selection strategies could evolve more easily.²⁴
- (B) Functional duplication could be minimized by allowing those city departments with existing expertise to handle CDBG requirements such as environmental assessments, contract administration, and financial management.²⁵
- (C) If needed, transfers of staff members from DCHD would assure continued daily management of the program regulations connected to the CDBG.

²⁴Ibid., p. 39.

²⁵Ibid., pp. 40-41.

- (D) As mandated in the city charter, DCHD could begin concentrating on implementing the program activities which include housing rehabilitation, code enforcement and social services.

The CDBG Program Should Be Completed in Its Entirety Before Annual Submission to HUD

Projects and activities should be identified, formulated, and costed for the mayor's and city council approval prior to the application date. In addition, suggested alternative components of the program must be included. In order to complete the CDBG program in this manner, the city would have to begin preparation well ahead of the program year or reduce the program review process significantly. If this occurred, it would not be necessary to hold additional project hearings and program reviews after submission of the application. The seventy-five day review period between submission of the application and HUD approval of the program might then be used to begin administrative preparations for project implementation. For example, environmental assessments might be started in order of project priorities during the review period so that projects could be closer to implementation by the beginning of the program year.²⁶

The Immediate Establishment of an Overall Community Development Policy which Identifies A Clear Definition of Objectives, Priorities, and Strategies for the CDBG Program

The mayor and city council should formulate a policy which will guide them in determining how the geographic and programmatic areas will be allocated. In addition, the policy must address certain questions.

²⁶Ibid., p. 42.

Key decisions are needed on the following questions:

- (A) Can Atlanta's Community Development program evolve as a mechanism that can generate new investment, replace obsolete facilities and uses, and strengthen the local economic base?
- (B) Should the city disperse the funds in a highly visible manner over as much of the city as possible or focus funds on fewer selected neighborhoods to maximize the impact?
- (C) How is the City of Atlanta coordinating and concentrating Community Development activities? This includes the financing of new physical development projects with CDBG funds or completing urban renewal and NDP projects.
- (D) How fast and effectively has the city been able to develop their organizational and administrative capacity to meet Community Development program needs?

The Completion of Urban Renewal Activities and Projects

The City of Atlanta's unfinished urban renewal and NDP projects comprise one vital issue that must be addressed. There are several outstanding obligations which cannot be ignored: a federal loan deficit of \$16.9 million; project completion costs totalling at least \$37.1 million; more than six-thousand housing units in need of rehabilitation; and 514 acres of unfinished development.²⁷

In order to complete urban renewal projects, the following should occur:

Concentrate a portion of CDBG funds for completing those unfinished urban renewal projects which could be resold to private developers. If this occurred, the city could generate additional funds in order to retire Atlanta's urban renewal loan deficit. In addition, the city could justify the already substantial investment directed to

²⁷Ibid.

these areas and gain additional property tax revenues.²⁸

Leveraging of Investments

Rehabilitation of funds could be made even more effective if they were leveraged with other resources. In many "reviving neighborhoods", a portion of the city's housing rehabilitation monies could be used as a pool of funds to insure private rehabilitation loans in much greater quantities.

Focused Investment

The development of clearer, more practical criteria for selecting CDBG target areas could prevent political considerations from dominating the process, as seems to be the case at present. An appropriate first step may lie in the never implemented proposal from DBP that a significant portion of CDBG funds be focused in "reviving neighborhoods".

Economic Development

The city needs to concentrate increasingly on economic development and, in particular, on attracting labor-intensive industry to the city. Since CDBG funds are the most logical resources to carry out Economic Development Programs, such programs, when developed, should be given priority funding status under the CDBG program. Once that occurs, Atlanta, like many other cities throughout the country, will begin to address the basic problems underlying urban decay rather than continue to treat only its symptoms.

²⁸ Ibid., p. 45.

The Need for Increased Technical
Assistance from HUD

Presently, HUD's role is limited to fund-dispensing and auditing. It has been mandated that the cities are allowed to spend the money with a minimum of red tape or bureaucratic interference from HUD. To date, there is a clearly identifiable need for additional technical assistance. This would enable Atlanta to build up local capacity to handle the new and complex community development functions. For example, Atlanta was inexperienced in initiating local rehabilitation loan funds. HUD must offer various forms of management technical assistance in order to help localities organize their governmental structure to better administer CDBG resources. The following are guidelines for improving and increasing HUD's role in the area of technical assistance:

- (A) Increase the capacity of local government:
 - a) establish and maintain goals, standards and priorities with respect to Community Development, which are responsible to local citizen groups;
 - b) develop and implement coordinated, comprehensive Community Development plans and strategies, including housing concerns, consistent with those goals, standards, and priorities;
 - c) administer and effectively coordinate local Community Development programs.
- (B) Simplify and consolidate the application process required for Community Development programs.
- (C) Simplify and minimize the federal review of applications.
- (D) Reduce the time required for processing applications.
- (E) Simplify and reduce post-approval requirements.

- (F) Assist cities in identifying projects which will best meet the objectives expressed in the applicable statutes and which assist in accomplishment of national goals set forth by the Secretary.
- (G) Develop policies to use Community Development resources, reviews and approvals in support of the housing goals.
- (H) Make maximum utilization of past Community Development funding commitments through aggressive project implementation, early close-outs, monitoring of execution activities, and monitoring of land and facility use after completion of execution activities.

Utilize the Management by Objectives in
Order to Implement the CDBG

Function I. Planning - Determine what work must be done.

- (A) Defining roles and missions. Determining the nature and scope of the work to be performed.
- (B) Determining key result areas. Determining where to invest time, energy, and talent.
- (C) Identifying and specifying indicators of effectiveness. Determining measurable factors on which objectives may be set.
- (D) Selecting and setting objectives. Determining results to be achieved.
- (E) Preparing action plans. Determining how to achieve specific objectives.
 - (1) Programming. Establishing a sequence of actions to follow in reaching objectives.
 - (2) Scheduling. Establishing time requirements for objectives and action steps.
 - (3) Budgeting. Determining and assigning the resources required to reach objectives.
 - (4) Fixing accountability. Determining who will see to the accomplishment of objectives and action steps.

- (5) Reviewing and reconciling. Testing and revising a tentative plan, as needed, prior to commitment to action.
- (F) Policy making. Establishing rules, regulations, or predetermined decisions.
- (G) Establishing procedures. Determining consistent and systematic methods of handling work.

Function II. Organizing - Classifying and dividing the work into manageable units.

- (A) Structuring. Grouping the work for effective and efficient production.
- (B) Integrating. Establishing conditions for effective teamwork among organizational units.

Function III. Staffing.- Determining the requirements for and ensuring the availability of personnel to perform the work.

- (A) Determining personnel needs. Analyzing the work for personnel capabilities required.
- (B) Selecting personnel. Identifying and appointing people to organizational positions.
- (C) Developing personnel. Providing opportunities for people to increase their capabilities in line with organizational needs.

Function IV. Directing (leading) - Bringing about the human activity required to accomplish objectives.

- (A) Assigning. Charging individual employees with job responsibilities or specific tasks to be performed.
- (B) Motivating. Influencing people to perform in a desired manner.
- (C) Communicating. Achieving effective flow of ideas and information in all desired directions.
- (D) Coordinating. Achieving harmony of group effort toward the accomplishment of individual and group objectives.

Function V. Controlling - Ensuring the effective accomplishment of objectives.

- (A) Establishing standards. Devising a gauge of successful performance in achieving objectives.

- (B) Measuring performance. Assessing actual versus planned performance.
- (C) Taking corrective action. Bringing about performance improvement toward objectives.

In addition, the planning and management process could be integrated with the concept of management by objective or used as an alternative approach in order to expedite CDBG program planning and implementation. (See Planning Management and Process in the Appendix).

SECTION VI

CONCLUSION

"The Housing and Community Development Act of 1974 is a reflection of the state of public policy," said Robert W. Maffin, executive director of the National Association of Housing and Redevelopment Officials (NAHRO). "It brings together a mixed bag of needed public programs and applies a single-short answer. It was born out of distrust, out of a rhetoric of failure and a disdain for some solid achievements. It was constructed from a lot of preconceived ideas, untested in a laboratory of experiences."²⁹

"Community development is not the product of a considered effort to solve urban development problems. It is a compromise between an Administration desiring to restructure federal relationships with local governments and a Congress desiring to combine a number of categorical grant programs," as stated by Arthur F. Evans, executive director of the San Francisco Redevelopment Agency in an open letter to former HUD Secretary Carla Hill.³⁰

The above opinions on the subject of community development represent some of the views which have been expressed by public officials, administrators and the general citizenry. The opinions vary from a

²⁹Beth Dunlop, "The Housing and Community Development Act: A First Second Review," AIA Journal, (February, 1976), p. 70.

³⁰Ibid.

highly critical view to a positive approach for solving the nation's urban problems.

There continues to be a mixed reaction on the advantages and disadvantages of community development. With this in mind, the conclusion will attempt to address and analyze the pros and cons which prevail. The conclusion does not limit itself to the City of Atlanta because the problems or concerns have been common in the majority of the cities which have entitlements.

In addition, the conclusion will not only provide an overview of the current status of the Community Development Program but it will focus on the future development of the program.

Has the Community Development Program lived up to the legislative intent during the past three years? This question can be addressed by focusing on the developments which have occurred since the inception of the CDBG.

Community development sets out to meet both long term and short-term development needs. It was the Housing and Community Development Act of 1974 which provided for only short-term financing. Short-term financing is appropriate to meet the maintenance and operating needs of local government: street lights can be installed; sidewalks repaired or replaced; some public facilities constructed; technical and social service provided. But, if there is need for major modernization or redevelopment, then short-term financing can hardly do the job.³¹

³¹ Mary K. Nenno, "First Year Community Development Grant Experience," Journal of Housing (April, 1977), p. 182.

Political factors are also likely to work to push the community development away from hard core slums and ghettos. The two largest programs replaced by the block grants--the multi-billion dollar Urban Renewal Program and the shorter-lived Model Cities Program--were aimed primarily at the most deteriorated neighborhoods.

This targeting, and requirements for citizen participation in these and other categorical programs, created a new and direct relationship between the federal government and slum residents. With the federal government as a sometimes ally, these neighborhoods began to do better in the competition for government funds. Previously since these neighborhoods were poor and usually black, and therefore lacking in political clout, they had been passed by, so much so, in fact, that federal intervention became necessary.³²

The untargeted and relatively stringless Community Development Block Grants, despite the legislative imperative that the money be spent in poor neighborhoods and despite citizen participation requirements, are likely to dilute the impact of the poor on city halls.

The federal government is now all but neutral, and in the interest of the new federalism, mayors have been freed to dispose of the money as they deem appropriate. Under the old programs, the money had to be spent in poor neighborhoods, and residents of those neighborhoods had a legally constituted voice in how the money was spent. Now these same people are in a citywide competition for funds, putting their needs against other worthy and not-so-worthy requests for money.

³²Robert L. Ginsburg, "Second Year Community Development Block Grant Experience," Journal of Housing, (February, 1977), p. 93.

Since this is occurring, it is not surprising that cities are focusing their money on less deteriorated neighborhoods, where the tasks are easier and the results can be seen, rather than addressing the extremely complex and difficult problems posed by seriously deteriorated neighborhoods.

It is also not surprising that civil rights and poverty groups are complaining that HUD has moved too fast to get the community development money out, with too little attention to whether it will reach those whose needs are greatest. In addition, HUD admits that they acted quickly, but cautious that this was not with malevolent intent. One of the aims of the act was to eliminate federal red tape, and, in fact, Congress allowed HUD no more than seventy-five days to process applications.

It will probably take several years to assess the full impact of the community development program. Even HUD expects the three-year results to show little. The assessment is that progress will be slow because of the institutional changes necessary.

Few of the country's community development watchdogs would disagree with the assessment. But many have begun to question the kind of programs which are getting underway, and where. They are also asking what happens to the neighborhoods which get left behind.

The evidence is not all in yet, but the pieces seem to be fitting together and the picture is as follows:

By all accounts, the community development program works well providing short-term funds which can be used for the reclamation of older, declining neighborhoods. But it does not do the job of the programs it replaced, whether or not they were successful. It provides help for people and neighborhoods which need help, but not for the people and neighborhoods which need help the most.

"If you want to go back and say this is a neighborhood rehabilitation program, fine", said Maffin. "Then you're going to have to come up with another extensive program which addresses the country's redevelopment needs." Maffin believes that what is most needed is a national public policy aimed at "saving and rebuilding cities," and contends that this requires three, not one, programs: (1) a neighborhood conservation program, "a clear, unmistakable program aimed at conserving housing, public facilities, industrial and commercial buildings that still have an important useful life"; (2) an urban redevelopment program, "a program that encourages and supports reinvestment in the city . . . aimed at those areas within cities that require long-term financing and heavy front-end investment . . . (that would) rid cities of physical conditions that debilitate human life, blight urban living and discourage private investment"; and (3) a housing program, "that encourages and assists homeownership, that helps low and middle income families conserve and modernize the existing stock . . . that creates new housing for all income levels on recycled urban land."³³

In the future, deliberations on extension and changes in the Community Development Program are likely to be subject to many of the same pressures witnessed during both 1974 and 1977. Perhaps the greatest question to be confronted in the years ahead as communities gain experience and begin to show accomplishments in maintaining their infrastructure and preventing blight will be the overriding conflict as to whether this program is one that responds solely to local needs or to a combination of needs and effective performance. In the future, it may not be

³³Beth Dunlop, "The Housing and Community Development Act: A First Year Review," AIA Journal, (February, 1976), p. 74.

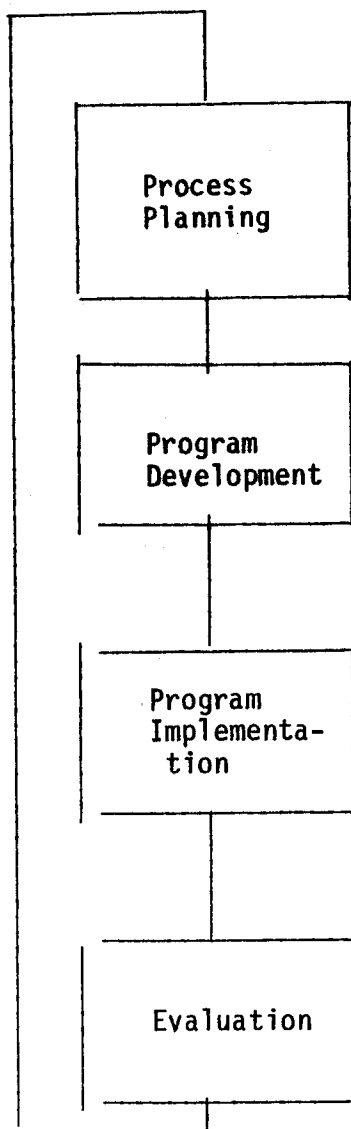
enough to reward communities solely on the basis of identified need, such as an aged housing, without attention to their actual performance in improving the quality of life in that community.³⁴

³⁴Mary K. Nenno, "Second Year Community Development Experience," Journal of Housing, (April 1977), pp. 115-118.

APPENDICES

APPENDIX A

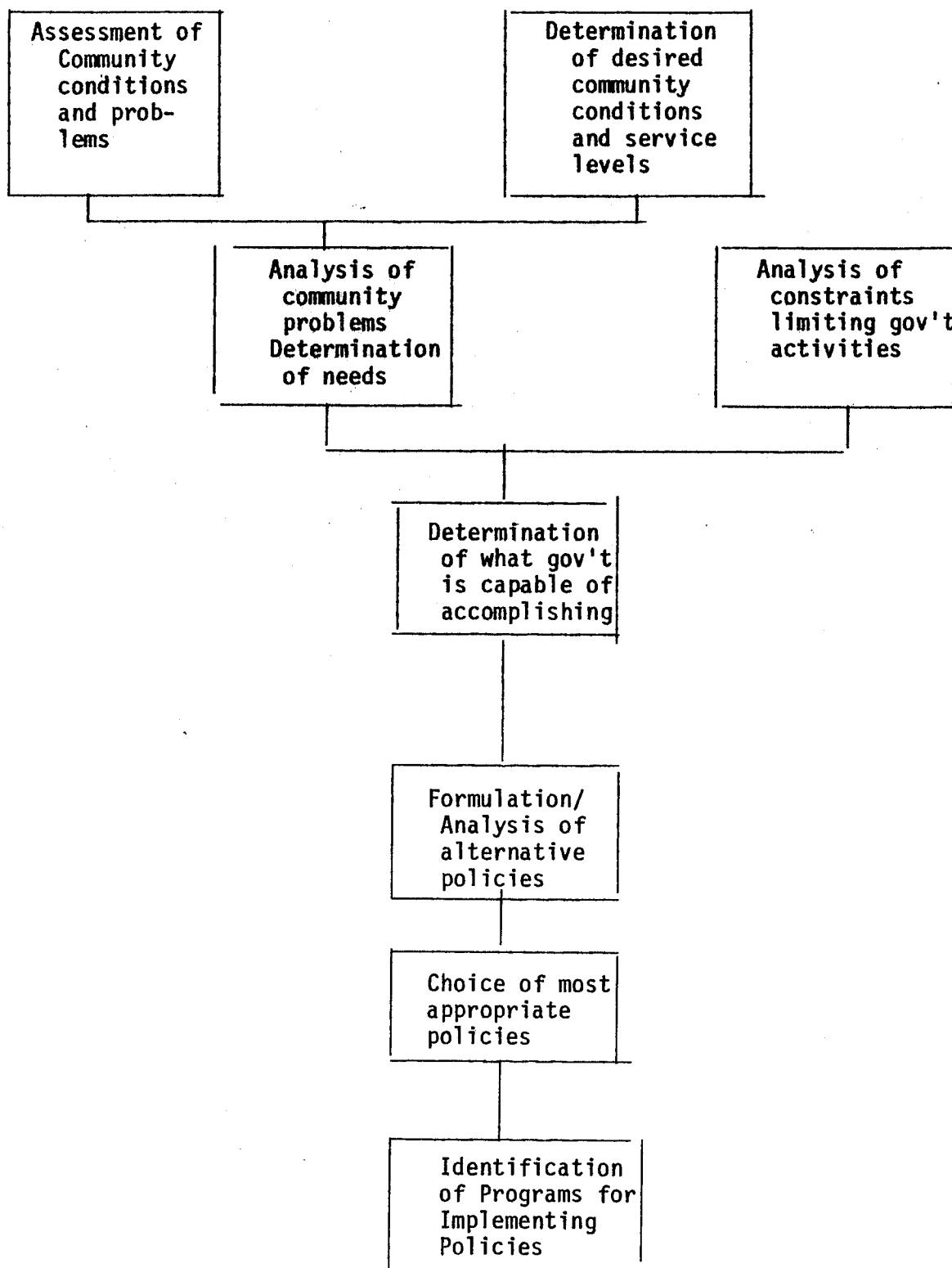
Planning and Management Process



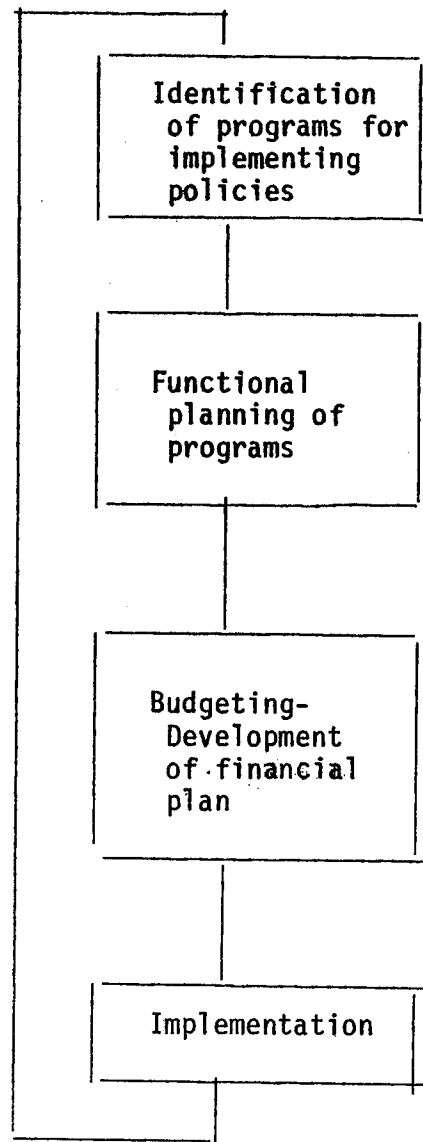
Functions and Process

The model of city government planning and management is conceptualized as basically consisting of four major components: policy planning; program development; program implementation; and evaluation. These components are arranged in block diagram form.

Elements Comprising Policy Planning



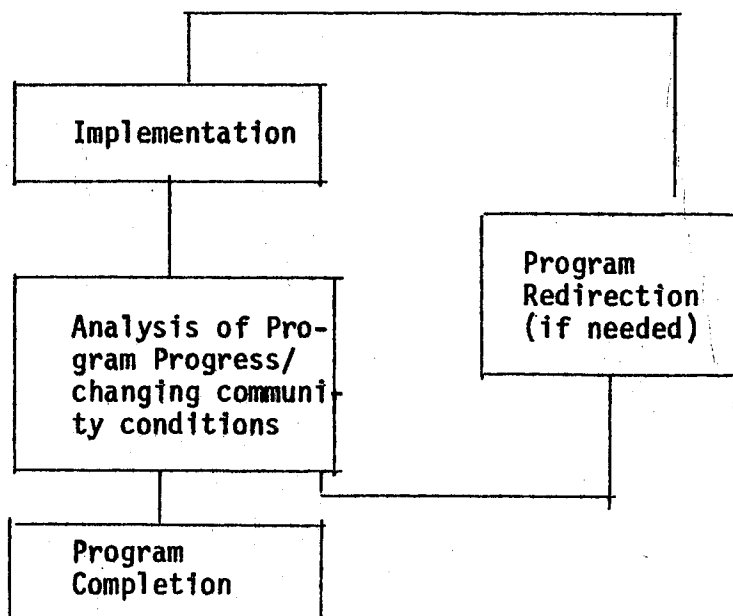
Elements Comprising Program Development



Program Development

Involves the translation of broad objectives into action-oriented programs that will carry out adopted policies. Program development includes the allocation of available resources to these programs in accordance with previously established priorities and timing (thereby constituting a fiscal plan or budget); the preparation of detailed physical, social, and economic plans to guide program implementation; and the development of the management and fiscal controls necessary to maintain desired program directions.

Elements Comprising Program Implementation



Evaluation

Involves the process of determining how well jobs have been done: whether program objectives have, in fact, been met or whether the important community conditions have been affected by the program. This process involves the determination of why objectives were not met and provides information for use in the refining of goals and policies. Apart from being a post mortem, the evaluation process can provide information of value in the design of new programs to deal with similar problems.

The broad function of evaluation may be divided into sub-categories: The first is performance, or the evaluation of the manner in which the work force understands its duties. The second is effectiveness, or the evaluation of the impacts which the city's programs had on the conditions of the community.

Performance evaluation is the more traditional component of planning and management. Most private businesses have a system of measuring and evaluating the performance of their employees, using cost accounting, production goals, supervisor accountability for costs and work quality. Performance evaluation requires a system of work reporting in terms both of resources used and products produced.

Effectiveness evaluation, making the link between program activities and changes in the community, closes the loop in the planning and management process. It requires the same kinds of information necessary early in the policy planning stage. And it requires comprehensive and continuous attention, if firm connections between actions and outcomes are to be

determined. The concern for evaluation must appear early in the process if it is to be more than an afterthought. It should replace opinion with knowledge.

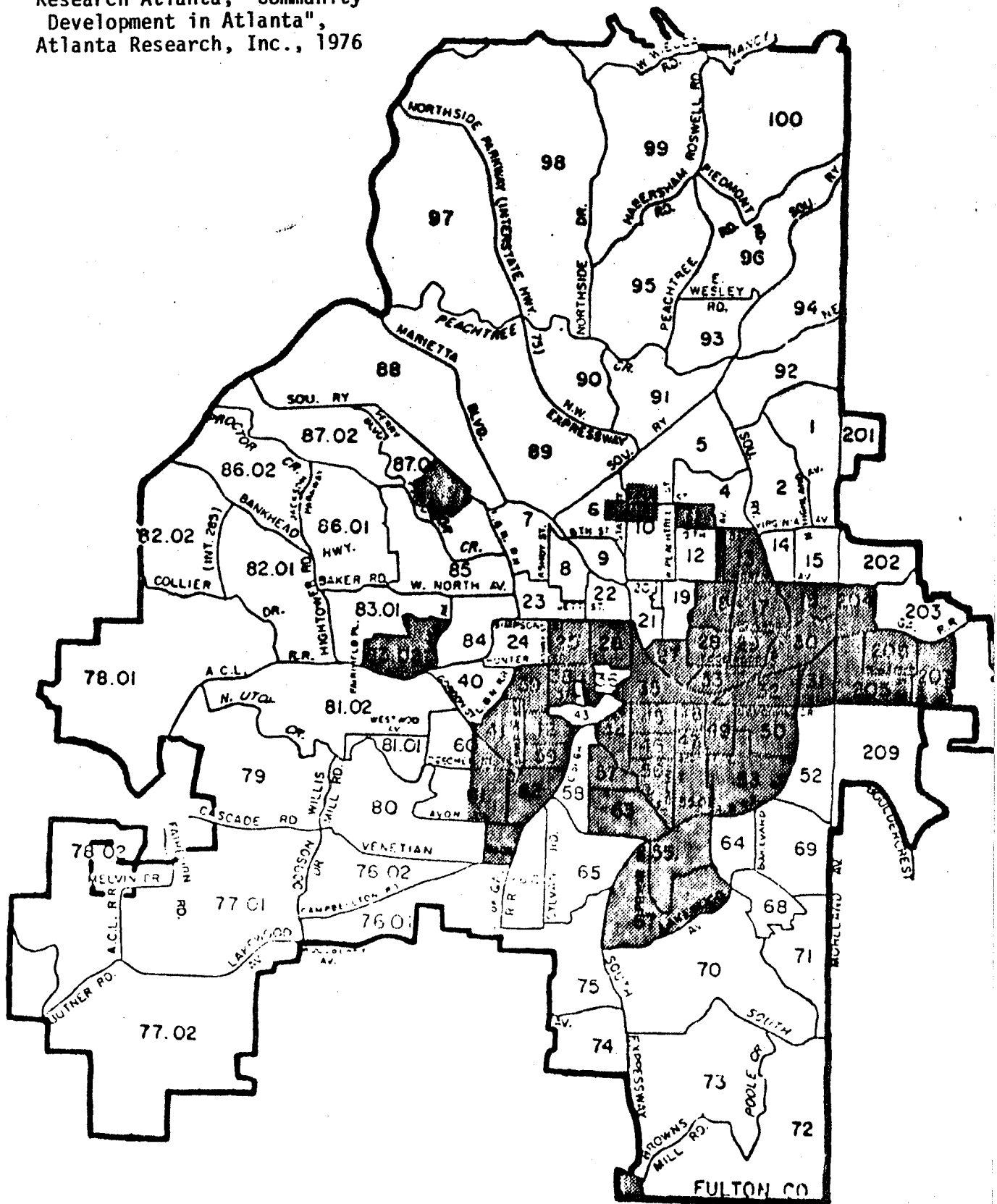
APPENDIX B

FIRST YEAR COMMUNITY DEVELOPMENT

IMPACT AREAS
(by census tract)

SOURCE:

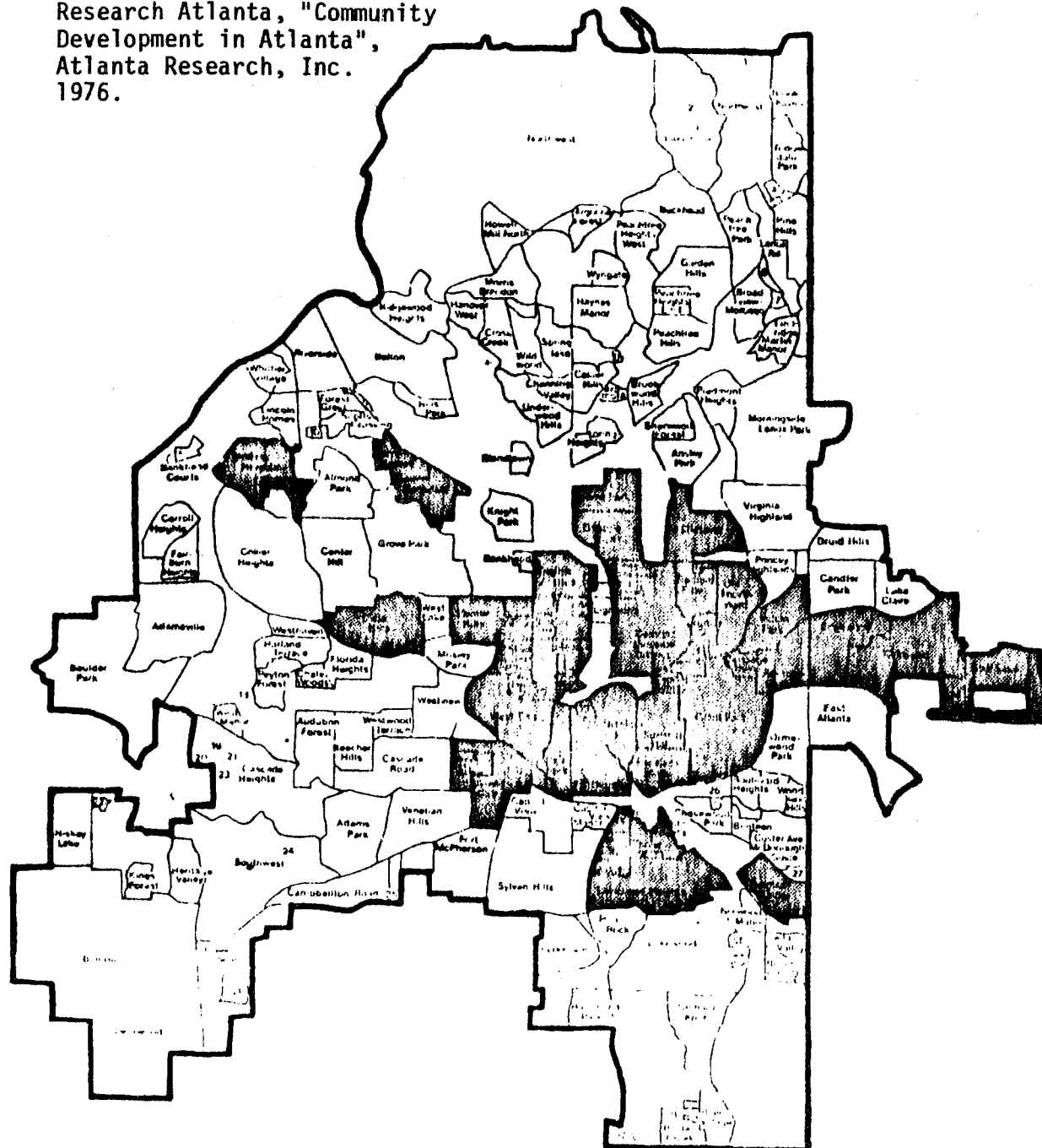
Research Atlanta, "Community
Development in Atlanta",
Atlanta Research, Inc., 1976



SOURCE:

IMPACT AREAS
(by neighborhood)

Research Atlanta, "Community Development in Atlanta", Atlanta Research, Inc. 1976.



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